

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE CHARLESTON COUNTY
COURT OF COMMON PLEAS

Frank D. Addy, Jr., Circuit Court Judge

Case No. 2016-CP-10-3696

RECEIVED

APR 23 2019

SC Court of Appeals

MARGARET CARR,

Respondent

v.

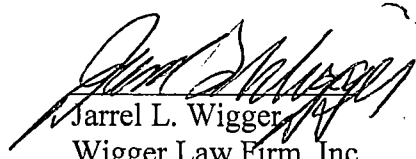
TW GRAHAM and COMPANY, LLC,

Appellant

MOTION TO ALLOW LATE FILING

Pursuant to Rule 240, SCACR, Respondent requests to file her Return to Defendant's Motion to Supplement Information, which was due on April 15, 2019, out of time. Since the previous attorney, Joshua T. Howle, left the firm, the file was inadvertently closed during a paralegal change.

Respectfully submitted,



Jarrel L. Wigger
Wigger Law Firm, Inc.
8086 Rivers Avenue, Suite A
North Charleston, South Carolina 29406
(843) 553-9800

Attorney for Respondent
Margaret Carr

April 18, 2019

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Frank D. Addy, Jr., Circuit Court Judge

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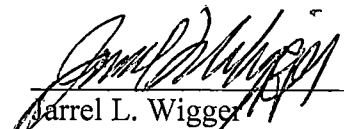
APR 23 2019

SC Court of Appeals

PROOF OF SERVICE

I certify that I have served the Respondent Margaret Carr's Motion to Allow Late Filing to Appellant TW Graham and Company, LLC by depositing a copy of the Respondent Margaret Carr's Motion to Allow Late Filing in the United States Mail, postage prepaid, on April 18, 2019, addressed to their attorneys of record Dennis E. O'Neill, Esquire; O'Neill Law Firm, LLC; 1473 Stuart Engals Blvd.; Mt. Pleasant, South Carolina 29464 and C. Mac Gibson, Jr., Esquire; 1473 Stuart Engals Blvd.; Mt. Pleasant, South Carolina 29464.

22
April 18, 2019


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JARREL L. WIGGER*
BRICE E. RICKER

EMILY H. TONG

*Board Certified Civil Trial Specialist
By National Board of Trial Advocacy

April 18, 2019

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APR 23 2019
SC Court of Appeals

VIA FED-EX

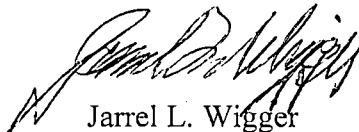
Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Margaret Carr, Respondent v. TW Graham and Company, LLC, Appellant
Appellate Case No.: 2018-001738

Dear Ms. Kitchings:

Please find enclosed our Motion to Allow Late Filing, Proof of Service, along with a check in the amount of \$50.00 representing the filing fee regarding the above-referenced matter. Please forward the filed documents to me in the self-addressed stamped envelope I have provided for your convenience. Should you have any questions or concerns, please do not hesitate to contact me.

Respectfully,



Jarrel L. Wigger

JLW/jdg
Enclosures

cc: Dennis E. O'Neill, Esquire
C. Mac Gibson, Jr., Esquire

00048

00100

FedEx Package
Express US Airbill

FedEx Tracking Number 8027 1673 6941

1 From
Date 4/17/19

Sender's Name William Smith Phone 843 553-9800

Company WIGGER LAW FIRM INC

Address 3086 RIVERS AVE STE A

City NORTH CHARLESTON State SC ZIP 29406-9821

2 Your Internal Billing Reference MALCOLM CALL

3 To Recipient's Name WIGGERS LAW FIRM Phone APR 23 2019

Company SC Court of Appeals

Address 1225 SUMMIT STREET

City Charleston State SC ZIP 29427

Address Use this line for the HOLD location address or for continuation of your shipping address.



0104424287

Form 0215

4 Express Package Service **2 or 3 Business Days**

NOTE: Service order has changed. Please select carefully. Packages up to 150 lbs. For packages over 150 lbs, see the FedEx Express Weight US Guide.

Next Business Day FedEx First Overnight FedEx Priority Overnight FedEx Standard Overnight

2 or 3 Business Days FedEx 2Day A.M. FedEx 2Day FedEx Express Saver

5 Packaging *Declared value limit \$500. FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options SATURDAY Delivery Signature Required Direct Signature Indirect Signature

Does this shipment contain dangerous goods? No Yes Yes Dry Ice Cargo Aircraft Only

7 Payment Bill to: Sender Recipient Third Party Credit Card Cash/Check

Total Packages Total Weight

*Our liability is limited to USD300 unless you declare a higher value. See the current FedEx Service Guide for details.

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